

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VOITH PAPER GMBH & CO. KG	:	
	:	Civil Action No. 07-226-JJF
Plaintiff,	:	
	:	
v.	:	
	:	
JOHNSONFOILS, INC.	:	
	:	
Defendant.	:	

**JOHNSONFOILS, INC.'S MOTION TO EXTEND THE DISCOVERY PERIOD AND
TO EXTEND THE DURATION OF VOITH'S WITNESS DEPOSITIONS**

Defendant, JohnsonFoilS, Inc. ("JohnsonFoilS"), by and through its undersigned attorneys, respectfully moves this Honorable Court for an Order:

1. Extending the period for discovery set by the Court's August 3, 2007 Scheduling Order by ninety (90) days; and
2. Extending the length of time permitted to conduct Voith's witness depositions to two (2) days (*i.e.*, fourteen (14) hours).

Support for this Motion is set forth in the accompanying Brief and Exhibits.

Respectfully submitted,

/s/ Patricia P. McGonigle

Dated: April 8, 2008

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*Attorneys for Defendant
JohnsonFoils, Inc.*

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NOTICE OF MOTION

TO: All Counsel Appearing on the Attached Certificate of Service

PLEASE TAKE NOTICE that JohnsonFoils, Inc. seeks to present its *Motion to Extend the Discovery Period and to Extend the Duration of Voith's Witness Depositions* to the Court on **Friday, May 9, 2008 at 10:00 a.m. or such earlier time as permitted by the Court.** JohnsonFoils is concurrently filing a motion to shorten the briefing period and set an expedited hearing with respect to the present motion.

Dated: April 8, 2008

Respectfully submitted,

Seitz, Van Ogtrop & Green, P.A.

/s/ Patricia P. McGonigle

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	:	
Defendant.	:	

PROPOSED ORDER

WHEREAS, Defendant, JohnsonFoils, Inc. (“JohnsonFoils”), has filed a Motion to Extend the Discovery Period and To Extend the Duration of Voith’s Witness Depositions; and the Court having considered the respective papers submitted by Plaintiff, Voith Paper GMBH & Co. KG (“Voith”), and JohnsonFoils in support of, or in opposition to, said motion; and the Court having considered oral argument of counsel for the respective parties, if any; and the Court having considered the pleadings in this matter and the current status of the case; and for other good cause having been shown;

IT IS HEREBY ORDERED, on this _____ day of _____, 2008, that JohnsonFoils’ Motion is **GRANTED**, and the discovery period is extended for a period of ninety (90) days. It is further **ORDERED** that the depositions for each of Voith’s witness will be extended to a period of two (2) days (*i.e.* fourteen (14) hours).

J.

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FOR THE DISTRICT OF DELAWARE**

VOITH PAPER GMBH & CO. KG

Plaintiff,

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JOHNSONFOILS, INC.

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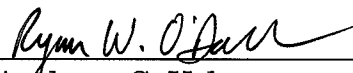
Civil Action No. 07-226-JJF

RULE 7.1.1 STATEMENT

Pursuant to Rule 7.1.1 of the Local Rules of the United States District Court for the District of Delaware, I hereby certify that counsel for Defendant, JohnsonFoilS, Inc. ("JohnsonFoilS"), has made a reasonable effort to reach agreement with counsel for Plaintiff, Voith Paper GMBH & Co. KG, on the matters set forth in JohnsonFoilS' Motion to Extend the Discovery Period and To Extend the Duration of Voith's Witness Depositions, and that the parties have not been able to reach agreement.

Respectfully submitted,

Dated: April 8, 2008



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JohnsonFoilS, Inc.*

CERTIFICATE OF SERVICE

I, Patricia P. McGonigle, Esquire, hereby certify that on this 8th day of April 2008, I electronically filed the foregoing pleading with the Clerk of Court using CM/ECF which will send notification of such filing to counsel of record. Further, I caused a copy of the foregoing pleading to be served upon the following counsel of record in the manner so noted:

Via Hand Delivery

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